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*Counsel for Defendant Clark County
School District*

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

MONICA BRANCH-NOTO, individually and
on behalf of JOHN DOE MINOR NO. 1, as
guardian of said minor, TIFFANY
PAULSON, individually and on behalf of
JOHN DOES MINOR NO. 2 and JANE DOE
MINOR NO. 1, as guardian of said minors,

Plaintiffs,

v.

STEPHEN F. SISOLAK, in his official
capacity as Governor of the State of Nevada,
AARON DARNELL FORD, in his official
capacity as the Attorney General of the State
of Nevada, CLARK COUNTY SCHOOL
DISTRICT, a public entity, DOES 1 Trough
100,

Defendants.

CASE NO. 2:21-cv-01507-JAD-DJA
Related Case: 2:21-cv-02036-GMN-BNW

**DEFENDANTS' NOTICE OF
RELATED CASES PURSUANT TO
LR 42-1**

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TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

1 In accordance with Local Rule 42-1, Defendant CLARK COUNTY SCHOOL
 2 DISTRICT (“CCSD”), by and through its attorneys of record, hereby file this Notice of a
 3 Directly Related Case. The following case involves the same defendants, involves the same
 4 legal issues, and, most importantly, involves the same underlying facts, and is therefore
 5 directly related to the instant case:

6 **JASON RUIZ, individually and on behalf of JANE DOE MINOR NO. 1, as**
 7 **guardian of said minor; ROBERT PARKER, individually and on behalf of JOHN DOE**
 8 **MINOR NO. 1 and JANE DOE MINOR NO. 2, as guardian of said minors; ERIN**
 9 **GOMEZ, individually and on behalf of JOHN DOE MINOR NO. 2 and JANE DOE**
 10 **MINOR NO. 3, v. STEPHEN F. SISOLAK, in his official capacity as Governor of the**
 11 **State of Nevada, AARON DARNELL FORD, in his official capacity as the Attorney**
 12 **General of the State of Nevada, CLARK COUNTY SCHOOL DISTRICT; Case No. 2:21-**
 13 **cv-02036-GMN-BNW, United States District Court, District of Nevada (hereinafter “Related**
 14 **Case”). The Related Case was filed in the Eighth Judicial District of Nevada, Case No. A-21-**
 15 **843061-C on October 25, 2021 by the same attorneys who filed the instant case and**
 16 **Defendants removed the action to Federal Court.**

17 Pursuant to LR 42-1(a), the instant case and the Related Case meet the five (5)
 18 enumerated qualifiers of whether cases are deemed related. As noted above, both cases
 19 involve the same claims by CCSD students and their parents challenging the same State-wide
 20 orders and CCSD’s policy that masks be worn to help mitigate the spread of COVID-19. In
 21 fact, the Complaints are nearly identical except for the fact that the Related Case was originally
 22 filed in state court with different plaintiffs despite the fact that the instant purports to be a class
 23 action. Further, in both actions plaintiffs allege that mask mandates caused them physical and
 24 emotional harm, and violated their constitutional right to due process and to make decisions
 25 regarding their children. Given the direct overlap of the cases, the discovery necessary for

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28 each will be nearly identical; therefore, the cases are related and should be consolidated to

1 avoid duplication and inconsistency.

2 DATED this 15th day of November 2021.

3 **GREENBERG TRAURIG, LLP**

4 By: /s/ Kara B. Hendricks

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10 *Attorneys for Defendant Clark County School*
11 *District*

CERTIFICATE OF SERVICE

I hereby certify that on **November 15, 2021**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

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